

MEMO ENDORSED**REESE LLP**

August 6, 2024

VIA ECF

Honorable Valerie E. Caproni
 US. District Court for the Southern District of New York
 Thurgood Marshal United States Courthouse
 40 Foley Square
 New York, NY 10007

USDC SDNY
 DOCUMENT
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Re: *Venticinque v. Back to Nature Foods Company LLC*, Case No. 1:22-cv-07497-VEC

Dear Judge Caproni:

I am one of the attorneys representing the Plaintiff, Gracemarie Venticinque, in this action. I am writing on behalf of Plaintiff's lead counsel, Michael Reese, who is out of town on a long-scheduled vacation with no internet access, to request an extension of the date for the Initial Pretrial Conference ("IPTC") and of the deadline for the submission of the Joint letter and Joint Case Management Plan and Scheduling Order. By Order dated August 2, 2024 (ECF No. 33), your Honor scheduled the IPTC for August 16, 2024, at 10:00 a.m., and ordered that the Joint letter and Joint Case Management Plan and Scheduling Order must be filed by August 8, 2024.

Plaintiff seeks an adjournment of the date for the IPTC. The reason for the proposed adjournment of the IPTC is that Plaintiff's lead counsel has a long-standing family commitment to be in California on August 16, 2024, the original date for the IPTC. There have been no prior requests for adjournment of the IPTC. Plaintiff has consulted with Defendant's counsel, Matt Borden, who has indicated that Defendant consents to the requested extension. Plaintiff has proposed alternative dates to Defendant's counsel and all counsel are available for the IPTC on September 20, 2024.

Plaintiff also seeks an extension of the August 8, 2024 deadline for the Joint letter and Joint Case Management Plan and Scheduling Order so that it will be due one week before any rescheduled IPTC date. In other words, if the IPTC were rescheduled for September 20, 2024, the Joint letter and Joint Case Management Plan and Scheduling Order would be due on September 13, 2024. Mr. Borden indicated that Defendant consents to this requested extension also.

We respectfully request that the extensions described in this letter, concerning which Defendant's counsel consents, be granted. Please let us know if you have any questions or need any additional information.

Letter re: Adjournment of Initial Pretrial Conference
August 6, 2024
Page 2 of 2

Respectfully submitted,

/s/ Charles D. Moore
Charles D. Moore
REESE LLP

cc: all counsel of record via ECF

Application GRANTED. The initial pretrial conference scheduled for **August 16, 2024 at 10:00 A.M.** is ADJOURNED to **September 27, 2024 at 10:00 A.M.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007. The parties' joint submission must be filed by no later than **September 19, 2024.**

SO ORDERED.

8/6/24



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE